

**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR
COUNTY OF
PLACER**

Conducted January 15-17, 2008

**California Department of Social Services
Human Rights and Community Services Division**

Civil Rights Bureau

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Reviewer:

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CIVIL RIGHTS COMPLIANCE REVIEW REPORT

I. INTRODUCTION

The purpose of this review by the California Department of Social Services (CDSS) Civil Rights Bureau (CRB) staff was to assess the Placer County Health and Human Services Agency (PCHHSA) with regard to its compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws.

An on-site compliance review was conducted on January 15-17, 2008. An exit meeting was held with Jane Christensen, Civil Rights Coordinator, as well as other administrative and program staff on January 17 to review the findings.

The review was conducted in the following locations:

Address:	Programs:	Non-English languages spoken by a substantial number of clients (5% or more)
Cirby Hills Office 101 Cirby Hills Drive Roseville, CA	In-Home Supportive Services	Russian
Roseville District Office 100 Stonehouse Court Roseville, CA	CalWORKs Cash Grant, Non-Assistance Food Stamps & Employment Services	Spanish
Auburn District Office 11519 B Avenue Auburn, CA	CalWORKS Cash Grant, Non-Assistance Food Stamps & Employment Services	Spanish

Enterprise Office 11716 Enterprise Drive Auburn, CA	Children's Services	Zero (Less than 5%, per 2007/08 Annual County Civil Rights Plan)
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SUMMARY OF METHODOLOGY

- Reviewed the 2007/2008 Annual Civil Rights Plans submitted by the County.
- Reviewed the civil rights discrimination complaint database for a complete listing of complaints filed against the County for the last year.

On-site review procedures included:

- Interviews of public contact staff
- Survey of program managers
- Case file reviews
- Facility inspections

Each site/program was reviewed for compliance in the following areas:

- Dissemination of Information
- Facility Accessibility for Individuals with Disabilities
- Bilingual Staffing/Services for Non-English-Speaking Clients
- Accessibility for Clients with Visual or Hearing Impairments
- Documentation of Client Case Records
- Staff Development and Training
- Discrimination Complaint Procedures

Here is a summary of the sources of information used for the review:

Interviews Conducted of Public Contact Staff:

Classifications	Total	Bilingual
Client Services Program Specialists	11	4
Client Services Practitioners	3	2
Client Services Program	1	1

Counselor		
Receptionist	3	0
Client Services Counselors	3	0
Total	21	7

Program Manager Surveys:

Number of surveys distributed	5
Number of surveys received	5

Reviewed Case Files: Total: **103**

English speakers' case files reviewed	14
Non-English or limited-English speakers' case files reviewed	89
Languages of clients' cases	English, Spanish, Russian, Romanian, Farsi, Vietnamese, Tagalog, Hindi, Ilocano, Arabic.

Sections III through VIII of this report contain specific Division 21 civil rights requirements and present field review findings regarding the county's compliance with each requirement. The report format first summarizes each requirement, then the actual review team findings, including appropriate comparisons. This format is an effort to validate the application of policies and procedures contained in the annual plan. Required corrective actions are stated at the end of each section.

Section IX of the report is reserved for a declaration of overall compliance.

III. DISSEMINATION OF INFORMATION

Counties are required to disseminate information about program or program changes and about how applicants and recipients are protected by the CDSS regulations (Division 21). This dissemination should occur through outreach and information to all applicants, recipients, community organizations, and other interested persons, including non-English and limited-English speakers and those with impaired hearing or vision or other disabling conditions.

A. Findings

Access to Services, Information and Outreach	Yes	No	Some-times	Comments
Does the county accommodate working clients by flexing their	X			Business hours are Monday through

hours or allowing applications to be mailed in?				Friday, 8:00 AM-5:00PM. Applications can be mailed into the office when necessary.
Does the county have extended hours to accommodate clients?	X			Specific arrangements can be made with workers to accommodate client's needs. Clients can contact ACCESS 24 hours a day to apply for IHSS. Emergency Response services are provided 24 hours, seven days a week for Child Welfare Services
Can applicants access services when they cannot go to the office?	X			Special arrangements can be made with the workers.
Does the county ensure the awareness of available services for individuals in remote areas?	X			Outreach activities can be obtained through Placer County Health and Human Services Internet site, Placer County networking Collaboration and the county web page. Additionally, partnerships with CBO's, the Placer County citizens brochure, the Senior Resource Guide for Placer County, and the Placer County Children's System of Care's extensive collaborative network.
Signage, posters, pamphlets	Yes	No	Some-times	Comments
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub 13)? Is the pamphlet distributed and			X	Children's Social Workers at the Enterprise office state they consistently provide & explain the

explained to each client at intake and renewal/re-certification?				<p>PUB 13 in the clients' primary language at initial contact. IHSS workers at Cirby Hills stated they provide & explain the PUB 13 in the client's primary language at initial application only. CalWORKs and NAFS workers from Auburn & Roseville D.O.'s states they provide & explain the PUB 13 in client's primary language at each application and redetermination/recertification.</p> <p>[X] Corrective Action Required</p>
Was the current version of Pub 13 available in English, Spanish, Lao, Vietnamese, Chinese, Hmong, Russian, Korean, Farsi, Armenian and Cambodian?			X	<p>All required languages were displayed at Enterprise Office, Auburn & Roseville D.O.'s. Cirby Hills office did not have any required PUB 13's displayed in lobby/reception area.</p> <p>[X] Corrective Action Required</p>
Was the Pub 13 available in large print, audiocassette and Braille?	X			<p>The alternate formats were present in all offices reviewed. However, recommend Cirby Hills office to relocate all of the alternate formats of the PUB 13 from the back room to the reception area office, providing</p>

				greater access to their clients.
Were the current versions of the required posters present in the lobbies?			X	<p>Required and current versions of Civil Rights posters were found in all lobbies reviewed. However, the poster at the Cirby Hills office did not contain the any CRC contact information.</p> <p>[X] Corrective Action Required</p>
Were there instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking clients translated into appropriate languages?			X	<p>Per the last Placer Co. annual Civil Rights Plan, the Cirby Hills office has a 5.26% Russian speaking population. All instructional and directional signage posted for clients must be translated in to Russian. Per same above referenced Plan, the Roseville D.O. Food Stamp Spanish speaking population is 6.21% and the Auburn D.O.'s CalWORKs Spanish speaking population is 7.32%. All instructional & directional signage posted to clients must be translated in to Spanish for those two offices, as they exceed the "5% threshold language" requirement.</p> <p>[X] Corrective Action Required</p>

B. Corrective Actions:

Informational Element	Corrective Action Required
PUB 13's	Pamphlets supplied by CDSS entitled "Your Rights Under California Welfare Programs" shall be made available in all waiting rooms and reception areas and shall be distributed and explained to each applicant/recipient at intake and reinvestigation of eligibility. The pamphlets shall be in the primary languages of the agency's applicant/recipient population including alternate formats. Div. 21-107.221
Posters	PCHHSA must ensure that the most recent version of Civil Rights posters on nondiscrimination provided by CDSS and USDA are prominently displayed in all waiting areas and reception rooms, including the name, address and phone number of the current CRC. Div. 21-107.211
Directional Signage	PCHHSA must ensure that all instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English speaking clients shall be translated into appropriate languages. Such signs, or an additional sign, shall state that applicants/recipients may request aid or services in their primary language. Div. 21-107.212 and .24

C. Recommendations:

The most recent version of the PUB 13 is March 2007. You may download the PUB 13 from the CDSS CRB website:

[http://www.dss.cahwnet.gov/civilrights/YourRights_498 .htm](http://www.dss.cahwnet.gov/civilrights/YourRights_498.htm).

Contact your CDSS Civil Rights program consultant to order the PUB 13 in Braille and audio versions.

IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

The Americans with Disabilities Act (ADA) requires public accommodations to provide goods and services to people with disabilities on an equal basis with the rest of the general public. The goal is to afford every individual the opportunity to benefit from the services available. The federal regulations require that architectural and communication barriers that are structural must be removed in public areas of existing facilities when their removal is readily achievable; in other words, easily accomplished and able to be carried out without much difficulty or expense.

The facility review is based on four priorities supported by the ADA regulations for planning achievable barrier removal projects. The priorities include ensuring accessible approach and entrance to the facility, access to goods and services, access to restrooms, and any other measures necessary.

Note that the references to the Americans with Disabilities Act Accessibility Guidelines (ADAAG) in the Corrective Action column refer to the federal Standards for Design. Title 24 of California Code and Regulations (T24 CCR) is also cited because there are instances when California state law is stricter than ADAAG specifications.

The county must ensure that programs and activities are readily accessible to individuals with disabilities. This includes building accessibility and availability of accessible parking as well as accessibility of public telephones and restrooms.

A. Findings and Corrective Actions

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

Facility Location: Cirby Hills, 101 Cirby Hills Drive, Roseville, CA

Facility element	Findings	Corrective Action
Main Entrance	No International Symbol of Accessibility signage (ISA) posted at front door entrance	REPEAT FINDING FROM 2005 REVIEW A sign with the International Symbol of Accessibility shall be posted at every primary entrance and every major junction indicating the direction along or to accessible features. (CA T24 1117B.5.2, ADA 4.30.5) p355

Public Pay Telephone	<p>The existing public pay telephone is not accessible. The existing telephone must be approached from the front, as a drinking fountain is on the left side and a restroom door on the right, prohibiting a side approach. The operable parts of the telephone are at 55", which exceed the maximum height of 48" for a front approach. In addition, it is not hearing-aid compatible as there is no mechanism for volume control.</p>	<p>If there is one or more single units, one or at least 50% of telephone unit(s) per floor must be accessible. (CA T 24 1117B.2.1, ADA 4.1.3(17)(a)) p251</p> <p>For forward reach telephone: highest operable part maximum is 48" above the floor. (CA T 24 1118B.5, ADA 4.31.3 and 4.2.5) p351</p> <p>At least one in each telephone bank and a minimum of 25% of the total number of public telephones shall be equipped with a volume control and shall be hearing aid compatible. (CA T24 1117B.2.8, ADA 4.1.3.17 (b) p 253</p> <p>Recommendation: Bring existing telephone into ADA compliance or remove public pay telephone altogether.</p>
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Facility Location: Roseville District Office, 100 Stonehouse Ct., Suite A, Roseville

Facility Element	Findings	Corrective Action
Parking Lot:	<p>There are four designated "accessible" parking spaces in total. Two are located in the back of the building close to a door used by employees who enter the building through</p>	<p>Persons with disabilities shall not be forced to travel behind parked cars other than their own. (CA T24 1129B.4.1 & 2) p 135</p> <p>Accessible parking must be located on the shortest</p>

	<p>a secured “employees only” entrance. These two designated “accessible” parking spaces are “accessible” to the employees, but not to the applicants/recipients who would use the public entrances either on the side or front of the building, as they are not located as close as possible to the public entrance. Additionally, the disabled person(s) are required to travel behind cars other than their own, resulting in an unsafe path of travel to the side and/or front door. There is no accessible path of travel from the back parking lot accessible spaces to either of the public entrances.</p> <p>The one designated “accessible” parking space in the front of the building does not have the required signage. The designated “accessible” space on the side of the building does have a freestanding sign, but it is not high enough at 65”. The “International Symbol of Accessibility” (ISA) on this sign is not regulation; it is made of masking tape and is backwards.</p>	<p>accessible route from the entrance. (CA T24 1129B.1.2, ADA 4.3.2 (1) p 131</p> <p>The accessible aisles for loading and unloading passengers must connect to the accessible path of travel, including curb cuts or ramps as needed. (CA T24 1129B.4.3, ADA 4.6.3) p 136</p> <p>Each parking space for persons with disabilities must be identified by a reflectorized sign permanently posted adjacent to and visible from each stall or space, consisting of a profile view of a wheelchair with occupant in white on dark blue background. The sign should be 70 sq. inches minimum area and when in a path of travel, shall be posted at a height of 80” minimum from the bottom of the sign to the finished grade. Instead of post-mounting, General Signage may be centered on the wall at the interior end of the parking space</p>
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		<p>at 36" minimum above the parking space finished grade, ground or sidewalk. (CA T24 1129B.5, ADA 4.6.4)</p> <p>Recommendation: You may wish to consider converting the regular parking space located to the right of the existing "van accessible" space to an additional "accessible" space, as the required access aisles for loading/unloading passengers already exists and the space is conveniently located to the side public entrance door.</p>
Main Entrance	<p>The required "accessible" ISA signage was not present at either public entrance door.</p> <p>Force to open the side door was too heavy at 7 lbs.</p>	<p>A sign with the "International Symbol of Accessibility" shall be at every primary entrance and every major junction indicating the direction along or to accessible features. (CA T24 1127B.3, ADA 4.1.3 (16B0, CA T24 117B.5.8.1.2) pp183, 353 ISA signage must possess characters, symbols having a non-glare finish. Characters and symbols must contrast with their background. (CA T24 1117B.5.2, ADA 4.30.5) p 355</p> <p>The force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133 B.2.5, ADA 4.13.11 (2) (a) & (b)) p 195</p>

	The main counter in the lobby reception area is too high at 43". It is very difficult to see and serve a person in a wheelchair.	REPEAT FINDING FROM 2005 REVIEW The height of accessible tables or counters is between 28"-34" from floor finish. (CA T24 1122B.4, ADA 4.32.4) p 349.
Drinking Fountain	The water fountain spout is located too high at 38"	The water fountain spout must be located within 6" of the front edge and 36" of the floor. (CA T24 1115B.2.1.5.3, ADA 4.15.2) p 213

<p>Public Pay Telephone (located outside building on agency grounds)</p>	<p>The public pay telephone is not ADA compliant. There is no volume control for hearing aid compatibility and the coin slot is located too high.</p>	<p>If there are one or more single units, one or at least 50% of telephone unit(s) must be accessible. (CA T24 1117B.2.1, ADA 4.1.3 (17)(a) p251</p> <p>For a forward reach phone, the highest operable part maximum is 48" from the floor. For a side reach phone, the highest operable part shall be at 54" maximum. (CA T24 1118B.5, ADA 4.31.3 & 4.2.5) p351 (CA T24 1117B.2.6 & 1118.6, ADA 4.31.3 & 4.2.6) p 251</p> <p>At least one in each telephone bank and a minimum of 25% of the total number of public telephones shall be equipped with a volume control and shall be hearing aid compatible. Telephones with volume control shall be hearing aid compatible and identified with a sign. (CA T24 1117B.2.8, ADA 4.1.3.17(b) p253</p>
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Restrooms: Both Men's & Women's	Designated "accessible" signage is found on restroom doors, but not on walls, as required.	Permanent wall and door signs must be installed. A wall sign must be installed on the outside wall, adjacent to latch side of door. If there is no space at that location, the sign should be placed on nearest adjacent wall, preferably on the right. The mounting height must be 60" above the floor to the center line of wall sign. Persons should be able to approach within 3" of the sign without encountering protruding objects or standing within the swing of any door. (CA T24 1117B.5, ADA 4.22.2 & 4.30)
Women's Restroom (only)	The toilet in the women's accessible stall is too low at 14 ¾" (15 1/2" including seat).	The required height of the water closet, (measured from the floor surface to the top of the toilet seat) is 17" minimum and 19" maximum. (CA T24 1115B.7.2, 1115B.2.1, ADA 4.17.2 & 4.16.3)
Pipes under sink (Women's Restroom)	Pipes are wrapped, but coming loose. Recommend re-wrapping of pipes under sink to provide secure insulation of hot water and drain pipes.	Hot water and drain pipes must be insulated or covered. No sharp or abrasive surfaces should exist under lavatories or sinks. (CA T24 1115B2.1.2, 1115B.7.1.1, 1115B.9.1, ADA 4.19, 4.23 & 4.27)

Facility Location: Auburn District Office, 11519 B Avenue, Auburn

Facility Element	Findings	Corrective Action
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<p>Parking Lot</p>	<p>There are five (5) designated 'accessible' parking spaces with two (2) designated as "van accessible".</p> <p>On three of the five "accessible" parking spaces, the posted signage is too low at 72"-73". It must be posted 80" from the bottom of the sign to the top of the finished grade.</p> <p>All access aisles for loading/unloading passengers need to have the words "No Parking" painted on the pavement.</p> <p>Designated "accessible" parking spaces need to have the International Symbol of Accessibility (ISA) repainted in three of the five parking spaces.</p>	<p>Raise the three "accessible" signs up to 80". Sign shall be 80" minimum from bottom of sign to top of finished grade. (CA T24 1129B.5, ADA 4.6.5) p133</p> <p>The words "NO PARKING" shall be painted on the ground in each 5' or 8' access aisle for loading/unloading passengers in white letters no smaller than 12". (CA T24 1129B.4.1 & 2) p 135</p> <p>Signage on pavement must clearly depict a wheelchair with occupant. Pavement signage must be 36" X 36" minimum, white on blue in color, visible and centered. CA T24 1129B.5.1 & 2) p 133</p> <p>Recommend that all the designated "accessible" parking spaces be re-stripped.</p>

Main or Alternate Entrance	There is a separate designated “accessible” entrance with a compliant ramp. There is signage in the parking lot directing the public needing accessibility to the accessible entrance. However, a client requiring accessibility may not park in an area with clear view of that one sign. Signage should also be posted at the front door of the main entrance directing the public to the accessible entrance.	A sign with the International Symbol of Accessibility shall be at every primary entrance and every major junction indicating the direction along or to accessible features. (CA T24 1127B.3, ADA 4.1.3 (16B), CA T24 1117B.5.8.1.2) pp183, 353.
Drinking Fountain	The existing drinking fountain located in the long hallway from the lobby is not compliant. It does not have sufficient knee space (at 15”) for wheelchair access and the spout is located too high at 42”.	<p>The knee space minimum for wheelchair accessibility is 27” from the floor. The water spout must be located 6” of the front edge and 36” from the floor. (CA T24 1115B.2.1.5.3, ADA 4.15.2) p213</p> <p>Recommend adding a compliant water fountain, or removing it altogether.</p>
Restroom Signage (Both Men’s & Women’s)	The required accessible door and wall signage is posted too high.	<p>Lower the signage. Door and wall signage must be at 60” from the floor to the mid point of the sign. (CA T24 1117B.5.7, ADA 4.30.6) p 263</p> <p>Observation: Considering the age of this building, etc. the public restroom facilities are accessible and compliant.</p>

**Facility Location: Children’s System of Care, 11716 Enterprise Drive,
Auburn**

Facility Element	Findings	Corrective Action
Parking Lot	This “L” shaped lot is shared with private and other government agencies, including DMV. The buildings are leased. There are a total of 3 “accessible” parking spaces. The owner recently relocated two “accessible” parking spaces to the front entrance of DMV. The other “accessible” parking space is located in front of the east wing of the building, with no public entry/access available. There is no safe route of travel and clients are required to go behind other cars across the parking lot to access a ramp for entrance to the front door of CSOC. This “accessible” parking space really is not “accessible” to anything.	<p>Recommend relocating at least one “accessible” parking space closer to the front entrance of CSOC.</p> <p>Accessible parking spaces shall be located as near as practical to a primary entrance and shall have required spaces. (CA T24 1129B.1, ADA 4.1.2(5)(a) p132</p> <p>Parking must be located as close as possible to the entrance on the shortest accessible route. (CA T24 1129B.1.2, ADA 4.3.2 (1) p131</p> <p>Persons with disabilities shall not be forced to go behind other parked cars except their own. (CA T24 1129B.4.3) p 136</p> <p>Access aisles (for loading and unloading) must connect to the accessible path of travel, including curb cuts or ramps as needed. (CA T24 1129.B.4.3, ADA 4.6.3) p 136</p>
Main Entrance	No “Accessible” signage was located at the main entrance.	<p>REPEAT FINDING FROM 2005 REVIEW</p> <p>A sign with the International</p>

		<p>Symbol of Accessibility (ISA) shall be at every primary entrance and every major junction indicating the direction along or to accessible features. (CA T24 1127B.3, ADA.3 (16B), CA T24 1117B.5.8.1.2) pp183, 353</p> <p>Characters, symbols and their backgrounds have a nonglare finish. Characters and symbols contrast with their background, either light characters on a dark background or dark characters on a light background. (CA T24 1117B.5.2, ADA 4.30.5) p 355</p> <p>The door pressure for the front door was too heavy at 11 lbs.</p> <p>(Note: It is noted that the reviewer was advised the door pressure is unable to be adjusted without major construction)</p> <p>Force to open doors, exterior, and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b) p195</p> <p>Recommendation: Upon entrance, reviewer noticed weather stripping is detached and needs to be re-glued, as it may interfere with wheelchair traffic.</p>
Lobby	There is no "accessible" counter or table top measuring between 28-34" high in the lobby reception area. The existing counter	<p>The height of accessible tables or counters is between 28"-34" from floor finish. (CA T24 1122B.4, ADA</p>

	is 42" high and is not "accessible".	4.32.4) p 349.
Restrooms	<p>In both Men's and Women's restrooms, there is "accessible" wall signage <u>only</u> and none on the doors.</p> <p>Door pressure for Men's restroom too heavy at 8 lbs. and Women's too heavy at 10 lbs.</p> <p>The operable parts of some dispensers/disposals in both Men's and Women's restrooms are located higher than 40" from the floor.</p> <ul style="list-style-type: none"> -Existing soap dispensers are at 47-48" from the floor. -Existing toilet seat covers are at 54-55" from the floor. -Existing mirror base is at 41" from the floor. -Existing paper towel dispenser is at 44-45" from the floor. 	<p>Permanent wall signs <u>and</u> door signs must be installed. Door sign and wall sign shall be 60" above the floor. (CA T24 1117B.5, ADA 4.22.2, 4.30) p263</p> <p>Force to open doors, exterior, and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b) p195</p> <p>Lower the existing dispensers/disposals to 40" maximum, or add another which is compliant. If towel, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40" from the floor. (CA-ACRM 1115B.9.2 and CA-ACRM 1115B.9.1.2, ADA 4.19.6) p269</p>

V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES

Counties are required by Division 21 to ensure that effective bilingual/interpretive services are provided to serve the needs of the non-English-speaking population and individuals with disabilities without undue delays. Counties are required to collect data on primary language and ethnic origin of applicants/recipients (identification of primary language must be done by the applicant/recipient).

Using this information, a county may determine 1) the number of public contact staff necessary to provide bilingual services, 2) the manner in which they can best provide interpreter services without bilingual staff and 3) the language needs of individual applicants/recipients. Counties must employ an appropriate number of certified bilingual public contact employees in each program and/or location that serves a substantial number of non-English-speaking persons. In offices where bilingual staff is not required because non-English-speaking persons do not represent a substantial number, counties must provide effective bilingual services through interpreters or other means.

Counties must also provide auxiliary aids and services, including Braille material, taped text, qualified interpreters, large print materials, telecommunication devices for the deaf (TDDs), and other effective aids and services for persons with impaired hearing, speech, vision or manual skills. In addition, they must ensure that written materials be available in individuals' primary languages when the forms and materials are provided by CDSS, and that information inserted in notices of action (NOA) be in the individuals' primary language.

A. Findings from Program Manager Surveys, Staff Interviews and Case File Reviews

Question	Yes	No	Some-times	Comments
Does the county identify a client's language need upon first contact? How?	X			Reception staff at initial contact identifies the language needs. If needed, the Language Line Identification Card is used.
Does the county use a "Primary Language Form"?			X	Form ALL #1381 (optional form) is inconsistently used. Many workers unaware of it. Used consistently by one worker in Roseville office and one worker in Tahoe office.
Does the client self-declare on this form?	X			
Are non-English- or limited- English-speaking clients provided bilingual services?	X			Non-English clients are assigned bilingual workers, if possible. The staff also uses the Language Line, Language World interpreters and client-provided interpreter, if necessary.
After it has been determined that the client is limited-English or non-	-	-	-	The workers had knowledge of how to request interpretive services by calling the

Question	Yes	No	Some-times	Comments
English speaking, what is the county process for procuring an interpreter?				Language Line, or requesting interpreters through Language World.
Is there a delay in providing services?		X		All staff interviewed and responses from the Program Manager survey state there is no delay in procuring interpretive services.
Does the county have a language line provider, a county interpreter list, or any other interpreter process?	X			
Is bilingual staff certified?			X	There is one Spanish speaking Social Worker in the CSOC Enterprise office that is <u>not</u> certified, and is utilized as a "bilingual social worker". [CORRECTIVE ACTION REQUIRED]
Does the county have adequate interpreter services?	X			Note that many staff members interviewed vocalized the need for more Russian speaking workers due to the influx of Russian speaking population in Placer County.
Does the county allow minors to be interpreters? If so, under what circumstances?		X		The staff reports that using minors to interpret is not appropriate and not done unless extenuating circumstances exist.
Does the county allow the client to provide his or her own interpreter?	X			
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	X			Workers state if there is any doubt that the client provided interpreter does not understand what is being interpreted, interpretive services are then provided.
Does the county use the CDSS-translated forms in			X	CDSS Russian translated NOA's/forms are not being

Question	Yes	No	Some-times	Comments
the clients' primary languages?				used as required/requested by the Russian speaking clients in the IHSS program at the Cirby Hills office. [CORRECTIVE ACTION REQUIRED]
Is the information that is to be inserted into NOA translated into the client's primary language?	X			This is found to be true based on the majority of case file reviews.
Does the county provide auxiliary aids and services, TDDs and other effective aids and services for persons with impaired hearing, speech, vision or manual skills, including Braille material, taped text, large print materials (besides the Pub 13)?	X			The county staff stated they would provide their clients with whatever auxiliary aids they needed and would do "whatever it takes" to accommodate their clients. Staff indicated someone would be made available to assist the visually impaired client in filling out the forms.
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	X			Workers stated that they read the information slowly and carefully to the client, checking frequently for understanding.
Does the county offer screening for learning disabilities?	X			
Is there an established process for offering screening?	X			It is the policy of the Employment Services program WTW staff to always offer this screening at

Question	Yes	No	Some-times	Comments
				Appraisal.
Is the client identified as having a learning disability referred for evaluation?	X			Referred to a contracted independent Psychologist for evaluation, who then makes a recommendation.

B. Corrective Action:

Area of Findings	Corrective Actions
Qualified Bilingual Staff	REPEAT FINDING FROM 2005 REVIEW A “Qualified bilingual employee” is defined as an employee who, in addition to possessing the necessary qualifications for the particular classification, is certified through a process approved or administered by CDSS. Div. 21-104.q
Written materials and use of CDSS translated Forms	REPEAT FINDING FROM 2005 REVIEW Placer County Health and Human Service Agency is required to provide forms and other written materials required for the provision of aid or services to the applicant/recipient in the individual’s primary language when such forms and other written materials are provided by CDSS. When the county uses translated forms and materials, such as Notices of Actions that contain spaces in which the county must insert information for the client, such information must be in the primary language of the client. Div. 21-115.2

VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS

Counties are required to ensure that case records document applicant's/recipient's ethnic origin and primary language, the method used to provide bilingual services, information that identifies an applicant/recipient as disabled, and an applicant's/recipient's request for auxiliary aids and services.

A. Findings from Case File Reviews and Staff Interviews

For each documentation item, the location and/or form where the item is documented in the case file is noted. Instances where the case review sample did not contain evidence of the documentation item, the information is based on staff interviews.

Documented Item	CalWORKs (Cash) and Employment Services (WTW)	Food Stamps (NAFS)	Children & Family Services	Adult Programs (IHSS and APS)
Ethnic origin documentation	SAWS-1 SAWS GAIN Appraisal	SAWS-1	CARE 015a, Health & Educ. Passport	SOC 295
Primary language documentation	SAWS-1 ALL #1381 (rarely used)	SAWS-1	CARE 015a, Health & Educ. Passport, E.R. Referral	SOC 295
Method of providing bilingual services and documentation	Bilingual Services appear to be provided, HOWEVER , the county staff rarely documents the case narrative/ comments regarding the provision of interpretive services. This also applies to the	Bilingual Services appear to be provided, HOWEVER , the county staff rarely documents the case narrative/ comments regarding the provision of interpretive services. This also applies to the certified bilingual	One case had very good documentation of use of Language Line Interpreters. Bilingual Services appear to be provided, HOWEVER , the county Social Workers rarely document the case narrative/	Use of Language Line and Language World Interpreters well documented. Excellent documentation of the provision of interpretive services.

Documented Item	CalWORKs (Cash) and Employment Services (WTW)	Food Stamps (NAFS)	Children & Family Services	Adult Programs (IHSS and APS)
	certified bilingual workers failure to document <u>their own</u> interpretive services provided to the client. They are not documenting themselves as the provider of interpretive services at each face-to-face and/or telephone contact with non-English or limited-English speaking clients. [CORRECTIVE ACTION REQUIRED]	workers who are also required to document <u>their own</u> interpretive services provided to the client. They are not documenting themselves as the provider of interpretive services at each face-to-face and/or telephone contact with non-English or limited-English speaking clients. [CORRECTIVE ACTION REQUIRED]	comments regarding the provision of interpretive services. This also applies to the certified bilingual workers who are also required to document <u>their own</u> interpretive services provided to the client. They are not documenting themselves as the provider of interpretive services at each face-to-face and/or telephone contact with non-English or limited-English speaking clients. [CORRECTIVE ACTION REQUIRED]	
Client provided own interpreter	Not found [CORRECTIVE ACTION REQUIRED]	Not found [CORRECTIVE ACTION REQUIRED]	Not found [CORRECTIVE ACTION REQUIRED]	Documented in case comments/narrative.
Method to inform client of potential problem using own	Not found [CORRECTIVE ACTION REQUIRED]	Not found [CORRECTIVE ACTION REQUIRED]	Not found [CORRECTIVE ACTION REQUIRED]	Documented in case comments/

Documented Item	CalWORKs (Cash) and Employment Services (WTW)	Food Stamps (NAFS)	Children & Family Services	Adult Programs (IHSS and APS)
interpreter	REQUIRED]	REQUIRED]	REQUIRED]	narrative.
Release of information to Interpreter	Not found [CORRECTIVE ACTION REQUIRED]	Not found [CORRECTIVE ACTION REQUIRED]	Not found [CORRECTIVE ACTION REQUIRED]	Signed Consent for Release of Information located in case files.
Acceptance or refusal of written material offered in primary language	Found four times in sample cases on county form ALL #1381. No other documentation located in case file. [CORRECTIVE ACTION REQUIRED]	Not found [CORRECTIVE ACTION REQUIRED]	N/A	Located in case comments/narrative.
Documentation of minor used as interpreter	Not found	Not found	Not found	Not found
Documentation of circumstances for using minor interpreter temporarily	N/A	N/A	N/A	N/A
Translated notice of actions (NOA) contain translated inserts	Provided as needed.	Provided as needed.	N/A	Provided as needed for Spanish. No Russian translated NOA's utilized. (Required Corrective Action for this

Documented Item	CalWORKs (Cash) and Employment Services (WTW)	Food Stamps (NAFS)	Children & Family Services	Adult Programs (IHSS and APS)
				element previously addressed)
Method of identifying client's disability	Statement of Facts, Case narratives, Screening Tool, case flags (No sample cases)	Statement of Facts, Case narratives (No sample cases)	Case Narrative, court documents, case plans (No sample cases)	SOC 295 & narrative
Method of documenting a client's request for auxiliary aids and services	Case narrative (No sample cases)	Case narrative (No sample cases)	Case narrative (No sample cases)	Case narrative (No sample cases)

B. Corrective Actions:

Documentation that bilingual services were provided	REPEAT FINDING FROM 2005 REVIEW Placer County Dept. of Health and Human Services must document the method used to provide bilingual services, e.g., assigned worker is bilingual, other bilingual employee acted as interpreter, volunteer interpreter was used, or client provided own interpreter. Div. 21-116.22
Documentation if client provided their own interpreter	REPEAT FINDING FROM 2005 REVIEW When applicants/recipients provide their own interpreter, the CWD shall ensure that the applicants/recipients are informed of the potential problems for ineffective communication. The CWD shall document the case record that the applicants/recipients were so informed. Div. 21-116.23

Documentation of interpreter signed confidentiality statement	Consent for release of information shall be obtained from applicants/recipients when individuals other than CWD employees are used as interpreters and the case record shall be so documented. Div. 21-116.24
General	Placer County Dept. of Health and Human Services must ensure that proper documentation is kept in the file that identifies all the required elements to ensure compliance. Div. 21-116

VII. STAFF DEVELOPMENT AND TRAINING

Counties are required to provide civil rights and cultural awareness training for all public contact employees, including familiarization with the discrimination complaint process and all other requirements of Division 21. The training should be included in orientation, as well as the continuing training programs.

A. Findings

Interview questions	Yes	No	Some-times	Comments
Do employees receive continued Division 21 Training?	X			The majority of the staff interviewed state they have received Civil Rights Division 21 training within the past year and on a regular basis.
Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint?	X			All of the staff interviewed was familiar with how to handle a discrimination complaint.
Does the county provide employees Cultural Awareness Training?	X			Staff interviewed stated they receive this training but would like to see more training specifically in the area of the new cultures (Russian) in the county.
Do the employees seem	X			.

knowledgeable about the predominant cultural groups receiving services in their area?				
Do the Children's Social Workers have an understanding of ICWA (Indian Child Welfare Act) and MEPA (Multi-Ethnic Placement Act)?	X			All of the Children's Social Workers interviewed were familiar with these acts.

Corrective Actions:

NONE REQUIRED

VIII. DISCRIMINATION COMPLAINT PROCEDURES

Counties are required to maintain a process for addressing all complaints of discrimination. They must track complaints of discrimination through the use of a control log in which all relevant information is kept, including when the complaint was received, the name of the complainant, identifying numbers and programs, basis of discrimination, and resolution. It is usually the Civil Rights Coordinator responsibility to maintain this log.

A. Findings from Staff Interviews and Program Manager Surveys

Interview and review areas	Yes	No	Some-times	Findings
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?	X			All of the staff interviewed was able to distinguish among the different types of complaints.
Did the employees know who the Civil Rights Coordinator is?	X			The majority of staff interviewed knew that Jane Christensen is the CRC.
Did the employees know the location of the Civil Rights poster showing where the clients can file a	X			The majority of staff interviewed knew the posters were located in the lobby waiting area.

Interview and review areas	Yes	No	Some-times	Findings
discrimination complaint?				
When reviewing the complaint log with the Civil Rights coordinator, was it up to date?	-	-	-	The complaint log has been forwarded to the assigned program analyst in the Civil Rights Bureau.

B. Corrective Action:

None required.

IX. CONCLUSION

The CDSS found the Placer County Health and Human Services Agency in substantial compliance with CDSS Division 21 Regulations, and other applicable state and federal laws with some exceptions. The CDSS would like to acknowledge and thank Ms. Jane Christensen, Civil Rights Coordinator for her coordination, assistance, and cooperation during the review. The Placer County Health and Human Services staff interviewed was found to be extremely professional, pleasant and committed to providing outstanding service to their clients. The staff are to be applauded for their willingness to “go the extra mile” to accommodate their clients.

Again, as in the 2005 review, the lack of documentation in the case files of the provision of interpretive services is still an issue. Based on the cases reviewed, it is noted that the IHSS Social Workers at the Cirby Hills office are documenting the provision of interpretive services correctly and in accordance with MPP Division 21 regulations. Of the IHSS cases reviewed, none of the workers were bilingual, but the cases contained correct documentation regarding the offer and acceptance/refusal of forms in client’s primary language. The cases also contained signed consent for release of information forms if the client preferred to use their own interpreter. Additionally, the cases reviewed contained full documentation of the provision of bilingual services, either by clients’ interpreter, agency interpreter, use of Telephone Language Line or use of Language World Interpreters.

This was not the case in the files reviewed in the CalWORKs, Welfare-To-Work, Non-Assistance Food Stamps and Children’s Services programs. However, it is noted that one bilingual worker in Roseville, one in Auburn and one bilingual worker from the Tahoe office did provide fairly consistent documentation of their own provision of interpretive services. For those non-English/limited-English speaking clients who did not have a bilingual worker, there is very little documentation contained in the case files indicating how interpretive services occurred, leaving the reviewer to question how the worker and the client communicated during face-to-face interviews and telephone conversations.

There is a county developed optional form ALL#1381 used very inconsistently throughout the agency. It was viewed only in cases from Tahoe and the Roseville offices and the workers interviewed from the Auburn District Office were unaware of the form. This optional primary language form, when utilized correctly, captures many of the required elements required by Division 21 regarding the documentation of the provision of interpretive services. It is recommended that the agency consider implementing this form program-wide OR ensure that workers are capturing all of the required Division 21 elements in their case comments/narratives (such as done by the IHSS Cirby Hills office). Jane Christensen was given sample forms used by other counties to meet these requirements.

It is noted that some past deficiencies from the Cirby Hills and Auburn District Office facilities have been corrected. However, there still are numerous facility violations that must be addressed. Of additional concern are the repeat facility violations from the 2005 report that remain uncorrected. Placer County Health and Human Services Agency must remedy the violations identified in this report by taking corrective actions. A corrective action plan must be received by CDSS within 60 days of the date of the cover letter to this report; and the plan must include a schedule by which all actions will be taken to correct the violations.

It is our intent that this report be used to create a positive interaction between the county and CDSS in identifying and correcting compliance violations and to provide the county with an opportunity to implement corrective action to achieve compliance with Division 21 regulations. Civil Rights staff is available to provide technical assistance as requested.